

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA NORTHEASTERN DIVISION

JOHN PRINCE,	)
	)
Plaintiff,	)
	)
V.	)
	) Case No.: 5:20-cv-00208-LCB
HUI HULIAU; DERYL WRIGHT;	)
HOWARD RUSSELL; and	)
4P MANAGEMENT COMPANY, LLC,	)
	)
Defendants.	)

## UNOPPOSED MOTION TO FILE UNDER SEAL PLAINTIFF'S RESPONSE TO DEFENDANT HUI HULIAU'S MOTION FOR APPROVAL OF OPERATIONAL CHANGES

Plaintiff John Prince ("<u>Prince</u>") moves the Court for permission to file under seal his Response to Defendant Hui Huliau's Motion for Approval of Operational Changes (the "<u>Motion</u>", doc. 34), which the Defendants filed under seal. As grounds, Prince states:

- 1. Defendants do not oppose this motion, as confirmed in email correspondence between counsel.
- 2. Defendants filed the Motion under seal because the "proposed operational changes involve sensitive business information that could be made detrimental to Hui Huliau if made public. Under the terms of the Consent

Injunct[ion], plaintiff was required to keep this information in 'strict confidence' in recognition of its sensitive nature." (Doc. 31at ¶ 3.)

3. Prince's response addresses the purportedly "sensitive business information" that Defendants desire to keep confidential. Accordingly, Prince requests the Court to allow his response to the Motion to be filed under seal.

WHEREFORE, Prince requests the Court to enter an Order allowing him to file his response to the Motion under seal.

Respectfully submitted this 29th day of May, 2020.

/s/ Benjamin L. McArthur
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Attorneys for Plaintiff John Prince

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this 29th day of May, 2020, served a copy of the foregoing upon all parties to the matter through the Court's electronic case management system, which will effect service upon the following:

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> /s/ Benjamin L. McArthur Of Counsel